IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

DAVID GOLDSTEIN, as the Executor of	§	
the Estate of DAVID NITISHIN	§	
	§	
Plaintiff	§	
	§	
VS.	§	CIVIL ACTION NO.
	§	3:20-cv-702-S
BIGELOW ARIZONA TX-372, L.P. d/b/a	§	
BUDGET SUITES OF AMERICA, TX-372;	§	
and YOUR BEST MANAGEMENT	§	
GROUP, LLC	§	
	§	
Defendants	§	

JOINT STIPULATION FOR DISMISSAL, WITH PREJUDICE

Plaintiff, DAVID GOLSTEIN, as the Executor of the Estate of DAVID NITISHIN, and Defendants, BIGELOW ARIZONA TX-372, L.P. d/b/a BUDGET SUITES OF AMERICA, TX-372 and YOUR BEST MANAGEMENT GROUP, LLC, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, hereby stipulate and agree to dismiss, with prejudice, all claims asserted or that could have been asserted by and among Plaintiff, DAVID GOLSTEIN, as the Executor of the Estate of DAVID NITISHIN, and Defendants, BIGELOW ARIZONA TX-372, L.P. d/b/a BUDGET SUITES OF AMERICA, TX-372 and YOUR BEST MANAGEMENT GROUP, LLC, in this action. The parties also hereby agree and stipulate that each party shall be solely responsible for their own attorneys' fees and costs.

Respectfully submitted, October 7, 2021.

VALLI KANE & VAGNINI LLP

/s/ Alexander M. White
James A. Vagnini
jvagnini@vkvlawyers.com
Alexander M. White
awhite@vkvlawyers.com
600 Old Country Road
Garden City, New York 11530
516.203.7180 – telephone
516.706.0248 – facsimile

Larry Taylor
Texas State ID No. 24071156
ltaylor@cochrantexas.com
Nicole Taylor
Texas State ID No. 24015130
Nicole.Taylor@cochrantexas.com
THE COCHRAN FIRM
3400 Carlisle Street, Suite 550
Dallas, Texas 75204
214.651.4260 – telephone
214.651.4261 – facsimile
COUNSEL FOR PLAINTIFF
DAVID GOLDSTEIN

DOWNS & STANFORD, P.C.

/s/ Timothy U. Stanford
Timothy U. Stanford
Texas State ID No. 19041030
tstanford@downsstanford.com
2001 Bryan Street, Suite 4000
Dallas, Texas 75201
214.748.7900 – telephone
214.748.4530 – facsimile
tstanford@downsstanford.com
COUNSEL FOR DEFENDANTS